



WATER LICENCE INSPECTION FORM

☒ Original
☐ Follow-Up Report

Licensee	Licensee Representative
Hamlet of Rankin Inlet	Justin Merrit (A/SAO), Joe Kaludjak (Hamlet Foreman), Megan Lusty (CGS)
Licence No. / Expiry (DD/MM/YYYY)	Representative's Title
3BM-RAN1214 (31/05/14)	-----
Date of Inspection (DD/MM/YYYY)	Inspector
19/08/14	WRO C. Wilson

Activities Inspected
<input type="checkbox"/> Camp <input type="checkbox"/> Drilling <input type="checkbox"/> Mining <input type="checkbox"/> Construction <input type="checkbox"/> Reclamation <input type="checkbox"/> Fuel Storage
<input type="checkbox"/> Roads/Hauling <input type="checkbox"/> Other: <input checked="" type="checkbox"/> Other: MUNICIPAL UNDERTAKING

Conditions:	A - Acceptable	C - Concern	U - Unacceptable	NA – Not Applicable	NI – Not Inspected			
Water Use	Condition	Comment	Site Conditions	Condition	Comment	Haz/Mat Management	Condition	Comment
Source:	NA		Water Management Structures	U	2	Storage	U	6,8
Intake/Screen	NA		Drainage	A	2	Spills	U	9
Flow Measure. Device	NA		Signage	U	10			
Water Use:	NA		infrastructure	A	5			
Recirculation (y /n)	NA		Landfarm	U	4	Administrative		
						Records	U	12
						Reports	U	-
Waste Disposal						Plans	U	1
Waste Water	A	2				Revisions	U	-
Solid Waste	U	3	Monitoring			Other		
			Sample Collection	U	11-13	Notification	U	15
			Analysis	U	14	Authorization	U	16
*The number in the comments field will correspond with specific comments provided below.								
Samples taken by Inspector: NA			Location(s):					
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No								

SECTION 1	<input checked="" type="checkbox"/> Comments (s. 1_)	<input type="checkbox"/> Non-Compliance with Act or Licence (s. __)	<input type="checkbox"/> Action Required (s. __)
File Synopsis			
<p>This licence is issued by the Nunavut Water Board (the Board) to the Hamlet of Rankin Inlet for the deposit of waste in a municipal landfill (located at 62 48’ 03.4” N, 92 04’ 22.0” W) and landfarm facility (located at 62 49’ 49.8” N, 92 10’ 16.2” W).</p> <p>In 2012 a renewal licence was issued to the Hamlet for the short term of two years due to outstanding compliance issues, one of which was failure to comply with an AANDC Inspector’s direction that was issues in 2008. Additional, the Hamlet failed to submit, a Compliance Plan which identifies and addressed ongoing compliance issues and a number of revisions to Plans submitted with the renewal application. The Board incorporated the compliance plan and revisions/submissions into the terms and conditions of 3BM-RAN1214.</p> <p>The entire list of requirements the Board identified during the decision process can be found from PG 2-7 under the heading “Decision” of the licence. For the purpose of this inspection report the applicable outstanding issues have been paraphrased below;</p> <ul style="list-style-type: none">- A revision to the Solid Waste Management Facility Operation and Maintenance (O and M) Plan to address the requirements under Part F, Item 2 of the licence. The revised plan is required within ninety (90) days of licence issuance.- A revision to the Environmental Emergency Contingency Plan (EECP) to address the requirements under Part F, Item 3 of the licence. The revised plan is required within ninety (90) days of licence issuance.- Submit a Quality Assurance / Quality Control (QA/QC) Plan to an analyst for approval. Upon approval, the licensee is required to provide the Board with a covering letter from the accredited laboratory and analyst, confirming acceptance of the Plan for the analyses to be performed under this Licence.- Submit a Landfarm Operational Contingency (LOC) Plan outlining the measures that will be taken should seepage become an issue. The contingency plan is to be included as part of the addendum to the EECP due within ninety (90) days of licence issuance. <p>With three additional requirements specific to the landfarm;</p> <ul style="list-style-type: none">- Have a qualified engineer undertake an annual geotechnical inspection to report on structural integrity and make recommendations on remedial works, where required.- Install groundwater monitoring wells, with one located up-gradient and one down-gradient of the facility- Submit stamped as-built drawings of the facility following the first geotechnical inspection in 2012 and installation of the groundwater monitoring wells. <p>None of the above requirements were met as of August 19th, 2014.</p>			



Pre Inspection Meeting Notes

Participants in the meeting were acting SAO Justin Merrit, Hamlet Foreman Joe Kaludjak, Hamlet of Rankin Inlet; Municipal Engineer Megan Lusty, Community Government Services, Government of Nunavut and inspecting Water Resource Officer C. Wilson, Aboriginal Affairs and Northern Development (AANDC), Government of Canada.

3BM-RAN1214 expired on May 31st 2014. A discussion based around the licensing process and requirements of the licence led the meeting. Information was requested by the A/SAO which could assist the Hamlet Council with decisions regarding resources required for the water licensing process. It was identified that a Plan was required between CGS and the Hamlet as to who would lead the water licence renewal process, annual reporting, and monitoring program objectives. The Hamlet recommended a meeting to be held with the new SAO, CGS and the Inspector to provide information directly to the Hamlet councillors. The Inspector concurs with the Hamlets recommendation.

Additional notes from the discussion and follow up;

-No progress has been made on the renewal application for the Hamlet of Rankin Inlet water licence.

-The Hamlet has not initiated any work on the new landfill or the decommissioning of the old landfill including the development of an Abandonment and Reclamation Plan for the old Landfill.

-The Hamlet discussed a plan to have the current Landfill compacted with a crusher. No specific details were provided to the Inspector. No information has been provided to the Board.

-The Hamlet has proposed to lock the Landfill facility when the new fence is in place to allow for proper management of the facility. The Hamlet council must vote whether locking the gate will be implemented this coming summer 2015.

- The Hamlet has been crushing old empty drums and palletizing them within the Landfill.

-In 2010 CGS contracted a consultant to sample the soil in the Hamlet's Landfarm and to determine the remaining remediation required.

Additional note: The Inspector met with Jason Tologanak, Regional Director Community Government Services in 2012 after the discovery of a breach in the berm wall of the Hamlet's Landfarm facility. Mr. Tologanak provided the sampling results for 2010 of the soil in the facility and identified the decommissioning of the facility as a priority due to a number of compliance issues.

According to the criteria set out in Section 5.1.2 of the Solid Waste Management Facility, Operations and Maintenance (O and M) Plan, Hamlet of Rankin Inlet, dated December 2008, the soil represented in the 2010 samples appears to have reached a remedial objective for soils used as Landfill cover. The Hamlet is reminded that remediated soil from the Landfarm must be sampled as per the QA/QC Plan and by a third party with the sampling results provided to Government of Nunavut's department of Environment Protection Service for discharge approval. Furthermore the 2012 annual report noted a Decommissioning Plan which will be implemented in 2014. This Plan is not available for review at the time of the inspection.

WASTE DISPOSAL

- 1) The Rankin Inlet Landfill experienced a number of fires within the facility this year. The community fire department extinguished the fires using cover and fresh water.
- 2) The waste water from the Landfill is contained in two small ponded areas located at the rear of the facility (Photo 1).

SITE CONDITION

- 3) The Landfill is lacking segregation. Areas have been designated inside the facility for bulky non-metals, and sewage screenings.
- 4) The Landfarm is not being operated as per the section 5.1 Solid Waste Management Facility Operations and Maintenance (O and M) Plan, Hamlet of Rankin Inlet, dated December 2008. During the inspection the Hamlet indicated no water has ever been discharged from the facility nor has any remedial work been completed by the Hamlet.
- 5) The Hamlet has installed a fence at the entrance of the landfill.
- 6) Contaminated soil is being stored in wooden crates at the landfill. The Hamlet of Rankin Inlet is reminded it cannot accept hazardous waste such as contaminated soil at the landfill. As per the O and M Plan this facility is for domestic waste and the hazardous materials are to be stored temporarily.
- 7) The Hamlet recently started sorting hazardous waste like batteries and propane cylinders. CGS representative has indicated a possibility of providing proper storage bags for batteries and training on safe handling of hazardous waste.

HAZARDOUS WASTE MANAGEMENT

- 8) Though progress has been made on sorting new hazardous waste the historical waste found inside the landfill remains an issue. 300 plus drums of unknown materials are found lining the entrance road of the dump. It was noted that drums are being crushed and palletized.
- 9) Contaminated soil has been historically deposited into the landfill, the Hamlet is aware that this activity is unacceptable. The party responsible for the contaminated soil is inevitable responsible for the soil treatment. The Hamlet is encouraged to report dumping to the Environment Protection Officers- GN. Recently CGS has started accepting contaminated soils into their landfarm (water licence 1BR-RAN0914) which is across the street from the Hamlet's Landfarm.

MONITORING

- 10) The Hamlet is lacking signs which identify the monitoring program sampling locations as required under Part H item 1
- 11) The Hamlet's Foreman, with coordination from CGS, has been completing the sampling for RAN-2. Currently this is the only sampling location that is being monitored.
- 12) The Hamlet is required to measure, record and characterize the materials entering the Landfarm as per PART H item 4 and 5. This information is not available for review during the inspection.
- 13) Groundwater monitoring wells at the Landfarm Facility were never installed therefore no samples have been taken as per



PART H item 1.

- 14) The Hamlet failed to submit a QA/QC Plan which is to include a Lab accreditation letter therefore failing to meet all the requirements of the Monitoring section of this Licence.

ADMINISTRATIVE

- 15) The Licence expired May 31st, 2014
16) The Hamlet has been operating the waste management facilities without a current license since May 31st, 2014
17) Annual report as required under PART B item 1 is outstanding for 2013.

OTHER

SECTION 2 ☐ Comments (s. __) ☒ Non-Compliance with Act or Licence (s. 2) ☐ Action Required (s. __)

PART B item 5- Failure to maintain signage which identifies sampling locations
PART B item 10- Failure to submit a compliance plan in 30 days of licence issuances
PART B item 12- Failure to fully implement all Plans associated with this licence
PART B item 13- Failure to carry out the Plans pursuant to the terms and conditions of this licence
PART B item 14- Failure to review Plans and modify them accordingly. This referred specifically to the Plans regarding the use of the new Landfill.
Part C item 4- Failure to store hazardous waste in such a way to prevent the deposit of deleterious substance into water.
PART D item 4- Failure to segregate and store all hazardous waste in a manner to prevent the deposit of deleterious substances into any water.
PART D item 6- Failure to treat all contaminated soils in the Landfarm
PART F item 1- Failure to submit revisions to O and M
PART F item 4- Failure to carry out geotechnical inspection on waste management facilities.
PART H item 1- Failure to maintain monitoring program stations
PART H item 4- Failure to measure and record the amount of material entering the Landfarm
PART H item 5- Failure to characterize soils that enter the Landfarm
PART H item 13- Failure to maintain Lab accreditation records
PART H item 14- Failure to submit a QA/QC Plan
PART H item 16- Failure to include sampling results in Annual Report

SECTION 3 ☐ Comments (s. __) ☐ Non-Compliance with Act or Licence, (s. __) ☒ Action Required (s. 3)

- The Hamlet will provide all sampling data collected for 2014 to the inspector before December 31st, 2014.
- The Hamlet will provide the QA/QC Plan as required by this License before December 31st, 2014. This document is required to ensure proper measures are being taken during the sampling for the monitoring program.
- The Hamlet SAO and CGS representatives will contact the inspector 60 days after November 30th, 2015 to discuss the Landfarm, new landfill and the renewal application.

The current licence scope does not accurately reflect the plans for the waste management facility in Rankin Inlet. The new landfill requires a number of improvements before commissioning though the Plans submitted during the 2012 renewal of this licence only discuss the new landfill facilities therefore providing no direction to the current facility. **The Hamlet will immediately initiate assistance from CGS to complete the beginning discussions on the renewal application for the water licence. A copy of this letter will be provided to the Inspector via email on later than December 15th, 2014. Failure to fulfill the actions identified above will result in further enforcement measures.**

Licensee or Representative	Inspector's Name
	Christine Wilson
Signature	Signature
	<i>Originally signed on file</i>
Date	Date

Office Use Only: Follow-up report to be issued by Inspector ☐ Yes ☒ No
Photo log attached ☒ Yes ☐ No



PHOTO LOG

Date:	Authorization Number:	Camera/Model:	Inspector
08/19/2014	3BM-RAN0914	Sony DSC-HX50V Cyber shot	WRO Wilson

Location name:	Lat/Long (DD.MM.SS.SS, NAD83)
Photo 1	62 48' 03.4" N, 92 04' 22.0" W
	
Description: Rankin Inlet Municipal Landfill. (Ariel Photo was taken at a different time from the inspection date)	

Location name:	Lat/Long (DD.MM.SS.SS, NAD83)
Photo 2	62 49' 49.8" N, 92 10' 16.2" W
	
Description: Hamlets Landfarm	



Location name:	Lat/Long (DD.MM.SS.SS, NAD83)
Photo 3	62 48' 03.4" N, 92 04' 22.0" W



Description:
Rankin Inlet Landfill. Drum storage area.